

LAW OFFICES OF ALBERT K. MARTIN
ALBERT K. MARTIN S.B. # 54059
4 WEST FOURTH AVE., SUITE 508
SAN MATEO, CALIFORNIA 94402
Telephone: (650) 342-6315
Facsimile: (650) 342-8493
alkmartin@yahoo.com

Attorney for Defendant
HUGO BONILLA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ATR-KIM ENG FINANCIAL
CORPORATION and ATR-KIM ENG
CAPITAL PARTNERS, INC.,

Plaintiffs,

vs.

HUGO BONILLA and MONICA
ARANETA,

Defendants

) CASE NO.: C07-06239 SC
)
) ANSWER OF DEFENDANT HUGO
) BONILLA
)
) [Originally filed in San Mateo County
) Superior Court Action No. 460691 on
) February 2, 2007]

Here comes Defendant, Hugo Bonilla, above-named, hereby answers the unverified First Amended Complaint of the Plaintiffs, ATR-KIM ENG FINANCIAL CORPORATION and ATR-KIM ENG CAPITAL PARTNERS, INC.:

1. Defendant, Hugo Bonilla, denies each and every allegation contained in Paragraphs 13, 21, 22, 24, 27, 47, 48, 49, 50, 51, 52, 57, 58, 59, 60, 61, 62, 64, 65, 66, 67, 68, 69, 70, 71, 73, 74, 75, 76, 77, 78, 79, 81, 82, 83, 84, 86 and 87.

2. Defendant, Hugo Bonilla admits allegations in Paragraphs 1, 2, 4, 5, 9, 10, 11, 12, 15, 16, 17, 19, 23, 24, 25, 26, 28, 29, 30, 34, 35, 36, 38, 39, 43, 44, 56.

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1 3. Defendant, Hugo Bonilla, denies the allegations set forth in Paragraph 14 and further
2 alleges that Defendant, Hugo Bonilla, was not the owner of the Wedgewood property but was
3 holding title in trust for the Araneta family, and upon their request, title was transferred to the
4 Araneta family.

5 4. Defendant, Hugo Bonilla, in responding to the allegations in Paragraph 18, incorporates by
6 reference his answer to Paragraph 14.

7 5. Defendant, Hugo Bonilla, in responding to the allegations in Paragraph 20, incorporates by
8 reference his answer to Paragraph 14.

9 6. Defendant, Hugo Bonilla, does not possess sufficient information to answer the allegations
10 in Paragraph 31, therefore, such allegations are denied.

11 7. Defendant, Hugo Bonilla, in answering the allegations in Paragraph 32, asserts that such
12 allegations are a legal conclusion, and upon information and belief, denies that Dora Aberouette is
13 an "insider".

14 8. Defendant, Hugo Bonilla, in answering the allegations in Paragraph 33, denies such
15 allegations and further alleges that the sale of the property was for the fair market value, the
16 proceeds from the sale were impounded by the Plaintiffs in this case.

17 9. Defendant, Hugo Bonilla, in answering the allegations in paragraph 37, denies such
18 allegations and further alleges that the Plaintiff impounded the proceeds from the sale of the
19 Sequoia Court property.

20 10. Defendant, Hugo Bonilla, does not possess sufficient information to answer the allegations
21 in Paragraph 40, therefore, such allegations are denied.

22 11. Defendant, Hugo Bonilla, in answering the allegations in Paragraph 41, denies that Dora
23 Aberouette is an "insider".

24 12. Defendant, Hugo Bonilla, in answering the allegations in Paragraph 42, denies such
25 allegations and further alleges that the sale of the property was for the fair market value, the
26 proceeds from the sale were impounded by the Plaintiffs in this case.

1 13. Defendant, Hugo Bonilla, in answering the allegations in Paragraph 45, denies such
2 allegations and further alleges that the Plaintiff impounded the proceeds from the sale of the Locust
3 Street Property.

4 14. Defendant, Hugo Bonilla, in answering the allegations in Paragraph 46, he incorporates by
5 reference his answers to Paragraphs 1 through 45.

6 15. Defendant, Hugo Bonilla, in answering the allegations in paragraph 53, he incorporates by
7 reference his answers to Paragraphs 1 through 45.

8 16. Defendant, Hugo Bonilla, in answering the allegations in Paragraphs 54 and 55,
9 incorporates by references his answer to Paragraph 14.

10 17. Defendant, Hugo Bonilla, in answering Paragraph 63, he incorporates by reference his
11 answers to Paragraphs 1 through 45.

12 18. Defendant, Hugo Bonilla, in answering Paragraph 72, he incorporates by reference his
13 answers to Paragraphs 1 through 45.

14 19. Defendant, Hugo Bonilla, in answering Paragraph 80, he incorporates by reference his
15 answers to Paragraphs 1 through 45.

16 20. Defendant, Hugo Bonilla, in answering Paragraph 85, he incorporates by reference his
17 answers to Paragraphs 1 through 45.

18 Dated: February 8, 2008

19 LAW OFFICES OF ALBERT K. MARTIN
20 Albert K. Martin
21 Attorneys for Defendant
22 Hugo Bonilla
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